

United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

(01) ADOLFO ALONSO MEDINA

(02) JUAN CARLOS AGUILAR

(03) MIGUEL FARID SOTO-CHAVEZ

**CRIMINAL COMPLAINT**

Case Number:

MS-11-17 AJB

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 10, 2010, in Ramsey County, in the State and District of Minnesota, Defendants, did unlawfully, knowingly, and intentionally conspire with each other and with others known and unknown to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine,

in violation of Title 21 United States Code, Section(s) 841(a)(1), 841(b)(1)(A), and 846.

I further state that I am a(n) DEA Task Force Officer and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Date

January 12, 2011  
The Honorable Arthur J. Boylan,  
UNITED STATES MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

Signature of Complainant

Michael F. Meyer

DEATF

at

Saint Paul, MN

City and State

Signature of Judicial Officer

SCANNED

JAN 12 2011

U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA )  
 )  
COUNTY OF HENNEPIN )

ss. **AFFIDAVIT OF MICHAEL F. MEYER**

1. I am a Task Force Agent (TFO) with the Drug Enforcement Administration (DEA) and have been so assigned for approximately two years. I am currently employed by the City of Saint Paul Police Department ("SPPD"). I have been in law enforcement for approximately twelve years. For the past seven and one-half years, I have worked in the SPPD Narcotics Unit investigating drug cases. In my capacity as a TFO with the DEA, I am responsible for the enforcement of the laws of the United States of America, including laws relating to drug enforcement. During my law enforcement career, I have conducted investigations into the unlawful possession, possession with intent to distribute, and distribution of controlled substances, and the associated conspiracies. I have been involved in over 100 drug investigations.

2. This Affidavit is submitted in support of a Complaint against the following individuals charging them with conspiracy to possess with intent to distribute methamphetamine, in violation of 21 U.S.C. § 841(a)(1), 841(b)(1)(A) and 846:

- (a) Adolfo Alonso Medina ("Medina");
- (b) Juan Carlos Aguilar ("Aguilar"); and
- (c) Miguel Farid Soto-Chavez ("Soto-Chavez"); and

The facts set forth herein are based on my participation in the investigation, my review of police reports, as well as conversations I have had with other law enforcement personnel. The information contained in this Affidavit is not meant to convey all the facts of this investigation, just sufficient facts establishing probable cause in support of the Complaint.

3. On or about the first week in January 2011, the DEA in Minneapolis received information from law enforcement agents in California that a large shipment of methamphetamine was expected by drug traffickers operating in the Twin Cities area of Minnesota.

4. On January 9, 2011, the methamphetamine arrived in Minnesota from California and was seized by law enforcement authorities. Law enforcement authorities substituted fake methamphetamine or "sham" for the real methamphetamine and loaded the sham in a Ford F-150 truck that was equipped with a secret compartment or trap. After the sham was loaded in the F-150, it was sprayed with an invisible coating that is only visible using a black light. The secret compartment was then closed. The purpose of spraying the sham was to determine if anyone touched the contents of the secret compartment once the compartment was accessed.

5. Also on January 9, 2011, the driver of the F-150 received a text with the telephone number (612)598-2547. Later, it was determined that the man using this telephone was Medina.

6. On January 10, 2011, the driver of the F-150 called (612)598-2547, but no one answered. Thereafter, the driver called the supplier of the methamphetamine and related this information. The supplier said that he would call back. Within minutes, the supplier called the F-150 driver back and said that he was sending two guys to pick up the F-150. Previously, the F-150 driver had related to the methamphetamine supplier that he was at a La Quinta hotel in St. Paul.

7. Later in the afternoon on January 10, 2011, the F-150 driver received a telephone call from Medina. The two discussed the delivery of the F-150. Throughout the afternoon, the F-150 driver and Medina had a series of telephone conversations regarding how the F-150 driver was going to get paid and how the delivery of the F-150 would occur. Medina said he did not have any money to pay the F-150 driver, but that he would contact "the guy" about payment and get back to the F-150 driver.

8. The same afternoon, the supplier of the methamphetamine called the F-150 driver and explained that if the F-150 driver did not receive payment in Minnesota, he would receive payment when he returned to California. The supplier of the methamphetamine assured the F-150 driver that it was okay to turn the F-150 over to the people in Minnesota.

9. In the late afternoon, early evening of January 10, 2011, Medina called the F-150 driver and related that his guy, later identified at Soto-Chavez, had rented a room at La Quinta. Medina told the F-150 driver to go to that room and meet his guy. Instead, the F-150 driver told Medina to have Soto-Chavez meet him in the parking lot.

10. As directed, Soto-Chavez met the F-150 driver in the parking lot. The F-150 driver explained to Soto-Chavez in detail how to open the trap in the F-150. Soto-Chavez then got in the F-150 and drove it out of the parking lot. Surveillance was able to follow the F-150 from the hotel parking lot.

11. Soto-Chavez was followed from the hotel by a Toyota Tundra pickup driven by Medina. Aguilar was a passenger in Medina's pickup. The two vehicles drove in tandem to a residence in South Saint Paul. I know from my training and experience that when drug traffickers receive a large amount of a controlled substance, they frequently have another vehicle follow in tandem to report to the owners and intended recipients about whether law enforcement might be conducting surveillance.

12. Soto-Chavez drove the F-150 to the residence in South Saint Paul and parked the truck in the garage. The garage door then shut. Law enforcement conducted surveillance of the house and the garage.

13. At approximately 6:15 p.m., a woman driving a Hyundai Sante Fe drove to the garage area. The Sante Fe stayed in the garage area for only a short period of time. Surveillance was too far away to observe exactly what happened at the location; however, within minutes, the Sante Fe departed the area and drove away. Within ten minutes, law enforcement stopped the Sante Fe. Aguilar was the front seat passenger. In the car, law enforcement discovered a suitcase filled with the sham methamphetamine. A black light inspection of Aguilar's hands showed that he had touched the sham methamphetamine secreted in the F-150. Law enforcement arrested Aguilar.

14. After the Sante Fe left the residence, it was followed by Medina and Soto-Chavez in the Toyota Tundra. Law enforcement stopped the Toyota Tundra at approximately the same time as the Sante Fe and arrested Medina and Soto-Chavez. In Medina's pocket, law enforcement located a bundle of the sham methamphetamine in one of his pockets. A black light inspection showed the "invisible coating" on the bundle and Medina's hands. Inside the Toyota Tundra was a cellular telephone with the number (612)598-2547.

15. Medina, Aguilar, and Soto-Chavez were all taken to the South Saint Paul Police Department and given their Miranda rights. They all agreed to waive their rights and be interviewed by law enforcement.

16. Under the scope of Miranda, Medina told law enforcement on Saturday, January 8, 2011, "Frijole" gave him the cellular telephone bearing the number (612)598-2547. Medina said Frijole told him that someone from California would be contacting him. Medina admitted that he had had numerous conversations that day with the F-150 driver about turning over the F-150. Medina claimed that he was to receive \$100 for getting the F-150. Medina stated that Aguilar was with him all day. Medina stated that Aguilar was supposed to drive the F-150, but he got scared. When Aguilar got scared, Medina called Soto-Chavez and asked him to pick up the F-150. After Soto-Chavez picked up the truck, Soto-Chavez called Medina. According to Medina, he followed Soto-Chavez to the house in South Saint Paul. Medina claimed that once the F-150 was parked in the garage, Soto-Chavez opened the secret compartment. Medina stated that Aguilar unloaded all the packages from the secret compartment. According to Medina, Aguilar broke off a piece from one of the packages of sham methamphetamine and gave a bundle to Medina. Medina explained that this was the bundle that law enforcement found in his pocket. Medina explained that this was

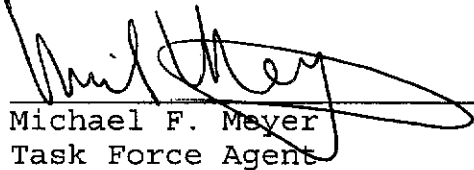
his payment for assisting with getting the F-150, along with the \$100 that he was going to receive from Frijole. Medina acknowledged that he knew that the F-150 was supposed to contain a large amount of "dope." Medina stated that Aguilar was in the Sante Fe because he asked the woman who was driving the car to take Aguilar.

17. Under the scope of Miranda, Aguilar stated that Medina called him and asked if Aguilar would help him pick up a vehicle and take out some stuff. Aguilar agreed and, later, Medina picked him up driving the Toyota Tundra. Aguilar stated that after Medina picked him up, Medina then dropped him off at a grocery store near the hotel and instructed him to buy some things. Less than half an hour later, Medina returned and picked up Aguilar. Medina and Aguilar then drove to a nearby apartment complex and met up with Soto-Chavez. Soto-Chavez drove in a separate car from his apartment complex to a location across the street from the La Quinta. Aguilar stated that Soto-Chavez picked up the F-150, and Aguilar and Medina followed the F-150 to the house in South Saint Paul. Aguilar and Medina parked on the street. The two then went into the garage and met up with Soto-Chavez. Aguilar related that Soto-Chavez opened the trap in the F-150. After that, Aguilar stated that he and Medina unloaded the packages from the F-150. Aguilar stated that he believed the packages contained narcotics. The packages were then loaded into a suitcase, which was in the garage. According to Aguilar, Medina then called a woman and asked her to come to the location. Also according to Aguilar, when the woman arrived, Medina asked the woman to take Aguilar and the suitcase to an apartment complex. Medina gave the woman partial directions. Medina told the woman that she and Aguilar would receive \$200 each for delivering the suitcase to the location. Medina told them that they should come back to the house in South Saint Paul after delivering the suitcase and he would pay them then.

18. Under the scope of Miranda, Soto-Chavez stated that Medina called him and asked him if Soto-Chavez would pick up a truck for Medina. Soto-Chavez said that Medina promised him \$500. First, Soto-Chavez stated that Medina and Aguilar drove to his apartment. Medina and Aguilar were in a Toyota Tundra. In a separate car, Soto-Chavez followed the Toyota Tundra to a location across the street from the La Quinta hotel. Soto-Chavez then rented a room at the La Quinta. Soto-Chavez then met with the driver of the F-150 in the parking lot of the hotel. There, the driver of the F-150 showed Soto-Chavez how to access the trap in the F-150. After learning how to access the trap, Soto-Chavez got the keys from the F-150 driver and took possession of the truck. Soto-Chavez claimed that he followed Medina in the Toyota Tundra to a house in South Saint Paul (this is not true, as law enforcement saw Soto-Chavez in the lead). Once Soto-Chavez pulled into the garage, he gave the

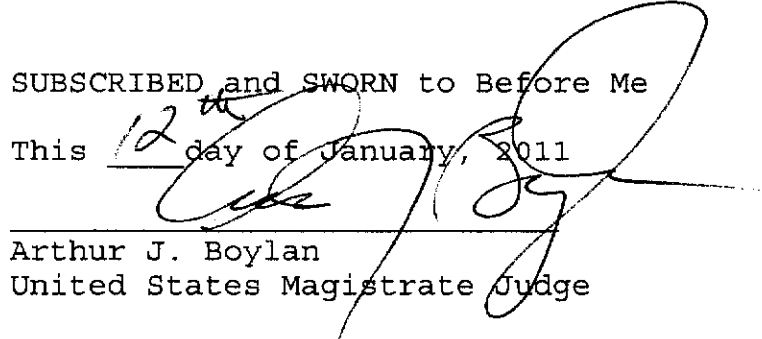
keys to Aguilar and told Aguilar how to open the trap in the F-150. Soto-Chavez stated that Medina then instructed him to get in the backseat of the F-150 and not look back. Soto-Chavez claimed that he did not look back at what Medina and Aguilar were doing in the garage. However, Soto-Chavez stated that he should have asked for more than \$500 given the amount of drugs that were hidden in the truck. After the F-150 was unloaded, Soto-Chavez stated that he left the garage area and walked back to Medina's Toyota Tundra.

Further Your Affiant Sayeth Not.

  
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Michael F. Meyer  
Task Force Agent  
Drug Enforcement Administration

SUBSCRIBED and SWORN to Before Me

This 12<sup>th</sup> day of January, 2011

  
\_\_\_\_\_  
Arthur J. Boylan  
United States Magistrate Judge